

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JIMMY (BILLY) McCLENDON, et al.,

Plaintiffs,

vs.

No. 6:95-CV-00024 JB/KBM

CITY OF ALBUQUERQUE, et al.,

Defendants,

vs.

E.M., R.L., W.A., D.J., P.S., and
N.W. on behalf of themselves and
all others similarly situated,

Plaintiff-Intervenors.

DECLARATION OF

Ronnisha Cail

Under 28 U.S.C. § 1746, I, Ronnisha Cail, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

On the weekends we are locked down with
no officer on the pod for over an hour.
Starting on Fridays. Ends Monday at 7:00 AM.
Last weekend another woman hung herself
in RHU-3; cell 11, when no CO was on the pod.
I feel unsafe being alone on the pod with
no officer. Call buttons don't work-nobody
answers.

Dated: 11/4/2021

Ronnisha Cail
MDC Inmate
Inmate No. 100226369

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
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DECLARATION OF

Felicia T Barza

Under 28 U.S.C. § 1746, I, Felicia T Barza, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

Well as far as the weekend we don't come out at all. There are never any CO in the unit to look after us. then if we have a full house we only get 30 min out. weekends in. RHD. 3 are just very bad. you got 1 CO. running 3 Pools. I have seizures what I fear is what if I have one and there is no CO to help me. this has happen. 2 times we need more CO and a fair time out,

Dated: Nov-4th 2021

Felicia Barza T
MDC Inmate
Inmate No. 100201558

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DECLARATION OF


BERNADETTE ETSITY

Under 28 U.S.C. § 1746, I, BERNADETTE ETSITY, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

EVERY WEEKEND HERE AT MDC WE ARE ON LOCKDOWN, WE DO NOT GET TO COME OUT FOR OUR TIME OUTS, AND MOST TIMES WE DO NOT HAVE A POD OFFICER. SO AN OFFICER THAT IS WATCHING MULTIPLE PODS COMES AND CHECKS ON US EVERY NOW AND THEN. JUST RECENTLY THERE WAS A GIRL WHO HUNG HERSELF BUT THE OFFICER THAT CAME TO CHECK ON US CAUGHT HER ON TIME. THANK GOD! IT'S BAD HERE.

Dated: NOVEMBER 4, 2021


MDC Inmate
Inmate No. 100190734

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DECLARATION OF

Joshua Moquino

Under 28 U.S.C. § 1746, I, Joshua Moquino, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

ONE OF MY MAJOR PRIORITIES IS HYGIENE. I WAS IN
RAU1. FROM THE LAST WEDNESDAY IN OCTOBER TO
Monday, November 1, 2021. WE WERE LOCKED DOWN
NO MOVEMENT - NO SHOWERS, NO PHONE CALLS, NO REC
TIME. THE LOCKDOWN WAS BECAUSE LACK OF STAFF. THEY
SAID THEY COULDN'T MOVE ME TO SHOWER BECAUSE
THEY DIDN'T HAVE STAFF. BEING LOCKED DOWN LIKE THIS
AFFECTS MY MENTAL HEALTH BADLY, I START THINKING NEGATIVE THINGS.
THE LOCKDOWNS CAUSE ill tension & unnecessary anger
AND ANIMOSITY between inmates & staff.

Dated: _____

MDC Inmate

Inmate No. _____

WHEN THERE IS A group of inmates kicking on the doors & yelling to get out you know everyone is mad & upset. I don't want to stay locked down for three days EVERY WEEK without any time out.

I AM CONCERNED FOR my mental health. Being in confinement is one thing. But being locked down and not getting hygiene, that affects me.

THE FACT we can't make a phone call to call out to our family - let them know we are okay - affects me.

IN RHU I, it was people who were sick who stayed locked down. OTHERS got out.

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DECLARATION OF

Eric Buckman

Under 28 U.S.C. § 1746, I, Eric Buckman, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

*In the last ten days, I have been out of my cell
for two hours total and I have only gotten to take
two showers. It has had a horrible effect on people
on the pod.*

Dated: 11-4-21

Eric Buckman

MDC Inmate

Inmate No. _____

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DECLARATION OF

Matthew M Carillo

Under 28 U.S.C. § 1746, I, Matthew M Carillo, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

I just did 15 months got out January
Came back 6 months later same case
been Lock down Thursday till Monday
~~same~~ ever since I been in this time
for the last 6 months

Dated: 11/10/21

[Signature]
MDC Inmate
Inmate No. 10063128

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DECLARATION OF

~~I Kevin D Blance~~

Under 28 U.S.C. § 1746, I, Kevin D Blance, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

I Kevin D Blance bring forth my
claim that I'm not allowed the proper amount of
time on time out. in P.H.U #4.

on thursday on 3-11 shift we are on lock down.
Then on Friday, Saturday and Sunday we are
also locked down with out being able to shower.
The reason the Correction officers state the above
mentioned is happening is due to a lack of Correction
officer!

Dated: 11-10-21

Kevin Blance
MDC Inmate
Inmate No. 100135940

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DECLARATION OF

DuWAYNE MORGAN

Under 28 U.S.C. § 1746, I, DuWAYNE MORGAN, declare

under penalty of perjury that the foregoing is true and correct and state as follows:

I AM HOUSED on RHU4. WE ARE locked down on this unit a lot. It is a restricted housing unit. ON THE DAYS WE GET out, WE DON'T GET our full time. WE only GET 30 or 45 minutes. THEN WE ARE VERY OFTEN LOCKED DOWN FROM THURSDAY TO SUNDAY - WE MIGHT GET TO GET out a little TIME ON SUNDAY. OFFICERS LEAVE THE POD AND WE ARE ALONE. SOMETIMES THE FOOD COMES AND JUST sits in the SHIPPORT GETTING cold till the CO COMES back. People ARE stressed out. I have mental health

Dated: _____

MDC Inmate

Inmate No. _____

ISSUES - being locked in a room for several days,
I START TO LOSE my mind. Its suffocating.
EVERYONE STARTS kicking the doors and it triggers
my PTSD AND ANXIETY. People are putting
poop and pee on their hands and in bottles
and are throwing it. THE LOCKDOWNS ARE

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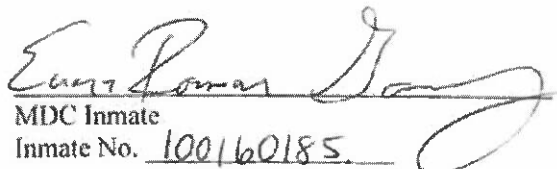
DECLARATION OF

MR. EVAN ROMAN GOMEZ

Under 28 U.S.C. § 1746, I, MR. EVAN ROMAN GOMEZ, declare

under penalty of perjury that the foregoing is true and correct and state as follows: WE THE PEOPLE, ARE BEING SUPPRESSED, HARRASSED, AND ILLEGALLY CONFINED IN M.D.C. WE ARE NOT GETTING PROPER OR ADEQUATE MEDICAL ATTENTION AS WELL AS PROPER HYGENIE ATTENTION DO TO OVERLY EXCESSIVE LOCK DOWNS. THEY (M.D.C) DOES NOT HAVE ENOUGH RESPECT OR CONCERN ABOUT US. WE THE PEOPLE. WE ARE U.S CITIZENS AND ARE GETTING SHUNED, ABUSED, DISCRIMINATED AGAINST. AND LEFT TO ~~ROT~~ ROT. ONE DAY THE LEFT US FOR 2 HOURS WITHOUT A C.O. AND WE DONT COME OUT FOR FOUR OR FIVE DAYS AT A TIME TO SHOWER OR ANYTHING. PLEASE BE ADVISED WE ARE HUMAN

Dated: 11.9.21


MDC Inmate
Inmate No. 100160185

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DECLARATION OF

Manuel Moreno

Under 28 U.S.C. § 1746, I, Manuel Moreno, declare

under penalty of perjury that the foregoing is true and correct and state as follows: Z

have been in MDC since May of 2021. They have regularly been reducing our cut time, or locking us down completely, the whole time I have been here. Nearly every weekend, and often for an extra day or two, we remain in lock down. They say it's because of staffing. Recently, in Rtu 4, lock down has been Thursday through Sunday. I am missing visits on top of being stuck in my cell.

Dated: 11/11/21

MD 11/11/21 Manuel Moreno (by Rtu 4)
MDC Inmate
Inmate No. 100245322